

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JNW

**DECLARATION OF MIKE  
HILL IN SUPPORT OF  
INTERESTED PARTY  
HUMBLE BUNDLE, INC.'S  
UNOPPOSED MOTION TO  
SEAL DOCUMENTS**

I, Mike Hill, declare as follows:

1. I am General Manager at Humble Bundle, Inc. (“Humble”). I make this declaration based on my personal knowledge of the information contained herein. I am over the age of eighteen and am competent to testify as to the matters set forth herein.

2. Humble is a privately held PC game publisher and platform. Through its platform, the Humble Store, Humble offers various products to PC gamers, including “bundles” of games sold together. Humble negotiates directly with PC game developers and publishers to include their games in Humble products, and each negotiation is individualized and its terms confidential.

3. I have been informed both Defendant Valve Corporation (“Valve”) and Plaintiff Wolfire Games, LLC (“Wolfire”) served Humble with third-party subpoenas to produce

documents and information, and that this information was used to prepare several documents in the parties' summary judgment briefing. I have reviewed the portions of the filings that refer to or include Humble information. Several of the documents, including HB\_Valve001262 and HB\_Valve005381, are strategic planning documents reflecting Humble's assessment of its market, its competitors, and its strategic plan for success in those markets. Others include Humble's revenue over time. Others include refer to or reflect strategic planning and financial information.

4. Humble carefully protects the secrecy of this information in the regular course of business. Disclosure of this information would inevitably provide Humble's present and future competitors an unfair (and irretrievable) strategic advantage over Humble. Competitors would also glean insights into Humble's financial trends across products, which would inform those competitors' strategic planning. It would also give PC game developers and publishers an unfair strategic advantage over Humble in future negotiations to include their PC games in Humble products.

I declare under penalty of perjury of the laws of the United States and the State of Washington the foregoing to be true and correct.

EXECUTED this 8/5/2025 day of August, 2025.

Signed by:

*Mike Hill*

By

Mike Hill